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February 14, 2022

Honorable Steven Tiscione
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

CONFIDENTIAL EX PARTE SUBMISSION

Re: Hernandez, et al. v. Marcofai Corp., et al.
Docket No.: 17-CV-887-GRB-ST
Our File No.: 17496 LL

Dear Honorable Magistrate Tiscione:

This office represents the defendants Marcofai Corp. (d/b/a Hicksville Flowers & Fruiterers), Martin Lebedin, Cora B. Lebedin, and Faith Barresse in the above-referenced action and the following will serve as our *ex parte* pre-settlement conference position, as directed by the Court.

Mindful that the Court has set a date of February 14, 2022 for the submission of a further correspondence with regard to the Court's recommendation, I respectfully request *one additional day* to file the correspondence as I need to spend some additional time conferring with my client. Thank you for your consideration of this request.

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Respectfully submitted,

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Sim R. Shapiro

By: Sim R. Shapiro